

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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2004 JUN -2 A 11: 29

TRACEY DESROCHERS,
Plaintiff

v.

DENNIS E. PIENDAK, Town Manager,
and LEO GAUDETTE, Fire Chief for
the TOWN OF DRACUT, on behalf
of the TOWN OF DRACUT,
Defendants

U.S. DISTRICT COURT
DISTRICT OF MASS

C.A. No. 04-10806 RWZ

JOINT STATEMENT

Pursuant to Local Rule 16.1(D) and this Court's Notice of Scheduling Conference, the parties hereby report to the Court as follows:

I. **AGENDA FOR SCHEDULING CONFERENCE**

The parties suggest the following agenda of matters to be discussed at the conference:

- a. The proposed scheduling plan for discovery and motions;
- b. The positions of the parties regarding settlement;

II. **COMPLIANCE WITH LOCAL RULE 16.1(D)**

- A. Discovery will end on December 2, 2004;
- B. Plaintiff will disclose his expert(s) by January 3, 2005;
- C. Defendants will disclose their expert(s) by February 3, 2005;
- D. All Expert Depositions shall be completed by March 4, 2005;
- E. Dispositive Motions:

Dispositive Motions shall be filed by April 4, 2005

Responses to dispositive motions will be filed by May 4, 2005

Oral Argument on the motions will take place before June 4, 2005 or such other time as the Court deems appropriate.

F. Pretrial Conference:

The parties request a pretrial conference after a decision on the dispositive motions. The parties suggest July 10, 2005 with trial scheduled in the weeks following.

IV. CERTIFICATIONS:


Certifications required by L.R. 16.1(D)(3) are being filed separately with the court.

Respectfully submitted,

The plaintiff,

TRACEY DESROCHERS,

By his attorney,



David T. Fulmer, BBO#

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Winchester, MA 02111

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The Defendants,

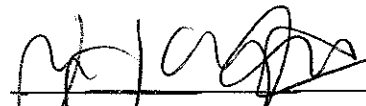
DENNIS E. PIENDAK, Town Manager and

LEO GAUDETTE, Fire Chief for the Town of

Dracut, on behalf of the TOWN OF DRACUT,

By their attorneys,

PIERCE, DAVIS & PERRITANO, LLP



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CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served upon each attorney of record, or pro se litigant, by mail, by hand,

6/1/04
Date

